



**CONESTOGA-ROVERS
& ASSOCIATES**

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www.CRAworld.com

June 11, 2009

Reference No. 053724

Mr. Peter Ramanauskas
United States Environmental Protection Agency, Region V
77 W. Jackson Blvd. (LU-9J)
Chicago, IL 60604

Dear Mr. Ramanauskas:

Re: Proposed Polychlorinated Biphenyls (PCB) Remediation
City Scrap & Salvage Facility
Akron, Ohio

On behalf of our client, City Scrap & Salvage, Conestoga-Rovers & Associates (CRA) is in the process of preparing an application to your department in accordance with the requirements of 40CFR761.61 C, *Risk-Based Cleanup*, for authorization to proceed with the remediation of PCB impacted soils at the City Scrap & Salvage facility (Site) located in Akron, Ohio. As discussed last week, prior to submitting the application, we are forwarding to you a brief summary of information related to the Site for an informal review. This informal review will help us identify any data gaps with the application before it is submitted in a formal manner to your department.

The Site which is located in an industrial part of the City of Akron, Ohio, has operated as a scrap metal processing facility for over 50 years on a 10-acre parcel of land. As part of site characterization for a pending property transaction, PCBs were identified in the soil at the Site. In total, 267 soil samples were collected and analyzed for PCBs, with results as follows:

- 77 samples were non-detect;
- 98 samples were less than 1 ppm;
- 67 samples were equal to or greater than 1 ppm, but less than 10 ppm;
- 13 samples were equal to or greater than 10 ppm, but less than 25 ppm;
- 10 samples were equal to or greater than 25 ppm, but less than 50 ppm, and
- 2 samples were greater than 50 ppm (52 ppm and 74 ppm).



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Based on a review of the analytical data and observations of the operating conditions at the Site, the proposed remediation can be summarized as follows:

- On property - soils with total PCBs greater than 50 ppm - excavate soils and transport to the EQ Company Landfill in Belleville, MI. (two areas impacted, approximately 75 cubic yards).
- On Property - soils with total PCBs greater than or equal to 10 ppm but less than 50 ppm- excavate impacted soil and transport to the Waste Management American landfill in Waynesburg, Ohio. (Approximately 710 cubic yards of soil).
- Adjoining off-property (CSX railway) - soils with total PCBs greater than or equal to 1 ppm (6 sample locations) - excavate impacted soil and either transport to the Waste Management American Landfill in Waynesburg, Ohio or use as fill for grading purposes on property in area under proposed concrete cap. (Approximately 150 cubic yards of soil).

The overall remedial goals, with the objective of obtaining closure for the Site, are as follows:

- On - property - remove all soil containing total PCB greater than 10 mg/ kg;
- Off-property - remove all soil containing total PCB greater than 1 mg/kg

The attached Conceptual Approach Summary contains the following information:

1. Site Description
2. Site Characterization Data Box Figures (Soil and Groundwater)
3. Proposed Remediation and Disposal of PCB Impacted Soils
4. Proposed Post Excavation Sampling Protocol
5. Backfilling and Restoration Plan
6. Schedule

As a final note, both the property owner and the perspective purchaser are motivated to begin the remediation process as soon as practical, and any assistance or recommendations that can be provided to fast track this process would be much appreciated.

We appreciate your help to conduct this informal pre-application review and look forward to receiving your feedback on this summary document.

Should you have any questions please do not hesitate to contact our office.



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Yours truly,

CONESTOGA-ROVERS & ASSOCIATES

A handwritten signature in black ink, appearing to read "Jeroen Winterink", is written over the company name.

Jeroen Winterink

JW/po/01

c.c.: Neal Weinfield (Greenberg Traurig, LLP)
Steve Katz (City Scrap & Salvage)
Randy Katz (City Scrap & Salvage)
Henry Cooke (CRA)